

1      **WEIL, GOTSHAL & MANGES LLP**

2      Theodore E. Tsekerides (*pro hac vice*)

2      (theodore.tsekerides@weil.com)

3      Jessica Liou (*pro hac vice*)

3      (jessica.liou@weil.com)

4      Matthew Goren (*pro hac vice*)

4      (matthew.goren@weil.com)

5      767 Fifth Avenue

5      New York, NY 10153-0119

6      Tel: (212) 310-8000

6      Fax: (212) 310-8007

7      **KELLER BENVENUTTI KIM LLP**

8      Tobias S. Keller (#151445)

8      (tkeller@kbkllp.com)

9      Peter J. Benvenutti (#60566)

9      (pbenvenutti@kbkllp.com)

10     Jane Kim (#298192)

10     (jkim@kbkllp.com)

11     650 California Street, Suite 1900

11     San Francisco, CA 94108

12     Tel: (415) 496-6723

12     Fax: (650) 636 9251

13     *Attorneys for Debtors and Reorganized  
14     Debtors*

15                   **UNITED STATES BANKRUPTCY COURT**  
16                   **NORTHERN DISTRICT OF CALIFORNIA**  
16                   **SAN FRANCISCO DIVISION**

17     In re:

18     **PG&E CORPORATION,**

19     - and -

20     **PACIFIC GAS AND ELECTRIC COMPANY,**

21     **Debtors.**

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**SCEDULING STIPULATION WITH  
RESPECT TO ANGELA RAMIREZ'S  
MOTION FOR RELIEF FROM  
AUTOMATIC STAY**

**Related Docket No.: 11396**

- 22      Affects PG&E Corporation  
22      Affects Pacific Gas and Electric Company  
23      Affects both Debtors

24     \* *All papers shall be filed in the Lead Case,  
25     No. 19-30088 (DM).*

1           **WHEREAS**, on January 29, 2019, PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas  
2 and Electric Company (the “**Utility**” and, together with PG&E Corp., the “**Debtors**” or  
3 “**Reorganized Debtors**”, as applicable), commenced with the Court voluntary cases under chapter  
4 11 of title 11 of the United States Code (the “**Bankruptcy Code**”). The *Debtors’ and Shareholder*  
5 *Proponents’ Joint Chapter 11 Plan of Reorganization dated June 19, 2020* [Docket No. 8048]  
6 (the “**Plan**”) was confirmed by Order of the Court dated June 20, 2020 [Docket No. 8053] (the  
7 “**Confirmation Order**”). The Plan became effective on July 1, 2020.

8           **WHEREAS**, on February 16, 2022, Angela Ramirez (“**Ramirez**,” and together with the  
9 Reorganized Debtors, the “**Parties**”) filed the *Motion for Relief from Automatic Stay* [Docket No.  
10 11936] (the “**Motion**”), which noticed a response deadline of March 1, 2022, and a hearing date of  
11 March 15, 2022 (the “**Hearing Date**”).

12           **WHEREAS**, the Parties have conferred and agreed to a revised schedule for the Motion.

13           **NOW, THEREFORE, UPON THE FOREGOING RECITALS, THROUGH THE**  
14 **UNDERSIGNED, THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT**  
**TO ORDER, THAT:**

15           1.       The Hearing Date shall be continued to March 29, 2022 at 10:00 am (Prevailing  
16 Pacific Time). The March 15, 2022 hearing on the Motion is taken off the Court’s calendar.

17           2.       Reorganized Debtors’ response to the Motion must be filed with the Court by  
18 March 15, 2022.

19           3.       Nothing herein prevents the Parties from agreeing to a further adjustment of the  
20 above schedule, subject to Court approval.

21           4.       This Stipulation shall constitute the entire agreement and understanding of the  
22 Parties relating to the subject matter hereof.

23           5.       This Stipulation may be executed in counterparts, each of which shall be deemed an  
24 original but all of which together shall constitute one and the same agreement.

25           6.       The Bankruptcy Court shall retain jurisdiction to resolve any disputes or  
26 controversies arising from this Stipulation.

1  
2 Dated: February 25, 2022  
3  
4

KELLER BENVENUTTI KIM LLP

*/s/ David A. Taylor*

David A. Taylor

*Attorneys for Debtors  
and Reorganized Debtors*

Dated: February 25, 2022

FORTHRIGHT LAW, P.C.

*/s/ Dow W. Patten*

Dow W. Patten

*Attorneys for Angela Ramirez*